



**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

*David E. Patton*  
Executive Director  
and Attorney-in-Chief

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

September 14, 2021

**BY ECF**

Honorable Judge George B. Daniels  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**SO ORDERED:**

*George B. Daniels*  
George B. Daniels, U.S.D.J.

Dated: **SEP 15 2021**

**Re: United States v. Sandra Maria De Oliveira Lindo**  
**18 Cr. 782 (GBD)**

Dear Judge Daniels:

I write to request permission for Ms. Lindo to change her son's property in Pembroke, Georgia, which is currently serving as collateral for her bond, with her own property in Jacksonville, Florida in light of her son needing to refinance his home due to the addition of two newborns into his family. The Government consents to this request.

On October 7, 2020, Ms. Lindo was released on her own recognizance, with travel restricted to SDNY/EDNY/N.D.Ga. and S.D.Ga. In fulfillment of the bond, Vitor Lindo's home located in Pembroke, GA 31321 was put as collateral. Ms. Lindo would instead like to place a lien on her property in Jacksonville, FL 32208. We have discussed this request with AUSA Stephanie Lake and she has indicated that the Government does not object to this request.

If the Court grants this request, we will issue the paperwork necessary in order to place a lien on Ms. Lindo's property in Jacksonville, Florida.

Respectfully submitted,

/s/

Zawadi Baharanyi  
Assistant Federal Defender  
(212) 417-8735

cc: AUSA Stephanie Lake